

From: [John Hebert](#)
To: [Russell Wasem](#)
Cc: [Laura Parsons](#); [Jennifer Gaines](#)
Subject: Fw: APHIS Zinc Phosphide Label (EPA Reg. No. 56228-6)
Date: 06/04/2009 04:37 PM
Attachments: [56228-6 Zinc Phosphide Concentrate 04-09.pdf](#)

Rusty - can you please take a look at the following APHIS email? The way I see it is that nothing really has changed for agricultural sites and this label. The applicator decides if bait stations are necessary. The issue is with other buildings/structures for outdoor placements. The mitigation says that all above ground outdoor placements must be in stations and within 50 feet of a structure. This would impact placements made for runways, docks, etc. Can there be an exception for ZP or do we go with the bait station / distance requirements that are in the mitigation?

thanks,
john

----- Forwarded by John Hebert/DC/USEPA/US on 06/04/2009 04:28 PM -----

From: Stephanie.H.Stephens@aphis.usda.gov
To: John Hebert/DC/USEPA/US@EPA
Cc: john.d.eisemann@aphis.usda.gov, Jeanette.R.OHare@aphis.usda.gov, Ann.M.Nasr@aphis.usda.gov, Jeffery.W.Jones@aphis.usda.gov
Date: 04/30/2009 02:00 PM
Subject: APHIS Zinc Phosphide Label (EPA Reg. No. 56228-6)

Use of Zinc Phosphide: Information for Agricultural and Nonagricultural Purposes (Rural Areas)

John-

At our meeting with EPA on March 11, we discussed with you issues relating to uses on APHIS' Zinc Phosphide Concentrate (EPA Reg. No. 56228-6) label (see attached for current approved label). As we mentioned, we have some concerns about how to address the rodenticide risk mitigation measures required by EPA in September 2008 on our label, particularly for the section on page 2 of our label entitled "In and Around Buildings." At our meeting, we agreed to provide examples of the types of buildings that APHIS typically would bait with zinc phosphide, in an attempt to determine the best way to update the label to be compliant with EPA's risk mitigation measures while still retaining a usable label for our APHIS applications.

The following are examples (but not limited to the examples) of agricultural facility sites: feedlots for cattle /hogs, dairies, poultry farms, and grain storage bins. Buildings around these sites are uninhabited most of the time and can include barns, equipment shops, feed storage, etc. In baiting around these sites, the use of zinc phosphide concentrate (56228-6) on various baits (i.e. apples) can be used for rodent control at bait stations, but not in bait boxes. Many times rodent burrows

around the foundations of these buildings are targeted with this product. Also, as required by the current label language, these baits are placed so that there is no access to livestock to the bait stations.

At nonagricultural sites, examples can be but not limited to airports, landfills, and docks which are also sites that have limited exposure to the public. These areas are the type of use sites which have limited access for the purpose of baiting to decrease rodent damage. Airport buildings such as hangars and other structures around the runways, etc. located within a security fenced area could be sites that this product could be used safely.

Hopefully this explanation will aid in our discussions with you about how to resolve label language issues. As always, I'm available at (435) 658-5134 to discuss this further.

Thanks,

Stephanie



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